

Jay Yerges

1	IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN	1	Said JAY YERGES, having been first
2		2	duly sworn by me to testify the truth, the
3	RONALD G. WOLFF, JR., and	3	whole truth, and nothing but the truth
4	KARRI E. WOLFF,	4	relative to said cause, in answer to oral
5	Plaintiffs,	5	interrogatories, deposed and made answer as
6	Case No. 22-cv-177-wmc	6	follows:
7	vs.	7	- - - - -
8	ADMINISTRATOR TINA RENEE VIRGIL,	8	(The examination began at 10:10 a.m.
9	in her official capacity, and	9	on June 30, 2023.)
10	SPECIAL AGENT JAY YERGES, in his	10	- - - - -
11	personal and official capacity,	11	<u>EXAMINATION</u>
12	Defendants.	12	BY MR. OLSEN:
13		13	Q Special Agent Yerges, thanks for being here
14		14	today. You understand we're here to talk
15		15	about a case involving a search that took
16		16	place on March 22nd of 2022, correct?
17		17	A Yes.
18		18	Q You've been deposed many times before,
19		19	correct, I'm sure?
20		20	A Deposed, not many times but deposed.
21		21	Q Okay. The basic premise is that I'll ask
22		22	questions. Your attorney may object. If
23		23	you don't understand something I'm asking,
24		24	please ask for clarification because
25	Jessica Koepsell, RPR, CRR	25	otherwise later on we might have a problem
	1		3
1	<u>APPEARANCES</u>	1	because you would have responded to
2	APEX ACCIDENT ATTORNEYS, LLC, of	2	something in a way that you didn't
3	Oshkosh, Wisconsin; MR. GEORGE W. CURTIS of	3	understand. Is that fair enough?
4	that firm appeared via videoconference on	4	A Fair.
5	behalf of the Plaintiffs.	5	Q First, I would like to ask you about the
6	EMINENT DOMAIN SERVICES, LLC, of	6	pre-search meeting that was held at the
7	Madison, Wisconsin; MR. ERIK OLSEN of that	7	Appleton field office on March 22nd of 2022.
8	firm appeared via videoconference on behalf	8	Do you remember that meeting?
9	of the Plaintiffs.	9	A Yes.
10	STATE OF WISCONSIN, DEPARTMENT OF	10	Q Who was in charge of that meeting?
11	JUSTICE, of Madison, Wisconsin;	11	A I was.
12	MS. GESINA S. CARSON of that firm appeared	12	Q What documents were given out to the
13	via videoconference on behalf of the	13	participants of that meeting, if any?
14	Defendants.	14	A A copy of the search warrant was made
15		15	available to all attendees along with the
16		16	operational plan.
17		17	Q How many attendees were at the meeting that
18		18	took place on the morning of March 22, 2022?
19		19	A At least 24.
20		20	Q Who made copies of the search warrant?
21		21	A I did.
22		22	Q How many copies did you make?
23		23	A I don't know an exact number.
24		24	Q Did you make enough copies that you intended
25		25	at least to give one copy to each participant
	2		4
1	<u>INDEX TO EXHIBITS</u>		
2	<u>EXHIBIT NUMBER</u>		
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1 at the meeting, or did you make a number of	1 specifically asked questions of you at the
2 copies so that people who were interested in	2 pre-op meeting?
3 having a copy could take one?	3 A Correct.
4 A Correct. I made, as I recall, at least ten	4 Q In order to facilitate things -- and I think
5 copies of the search warrant, had it	5 this is clear. When I say pre-op meeting, I
6 circulated around the room so that everyone	6 mean the meeting that occurred in the
7 could inspect it, read it, and ask questions	7 morning of March 22, 2022, before the search
8 as they saw fit. And then I made certain	8 of the Wolff premises that we're referring
9 that my team leads at each of three search	9 to here.
10 warrant locations could have a copy so that	10 A Yes.
11 it could be executed or provided to the	11 Q Okay. So when I say pre-op meeting, we mean
12 premises or any individual.	12 that meeting. I won't go giving this long
13 Q What is the name of that meeting? I've	13 explanation every time, fair?
14 heard two names, a pre-search instruction	14 A Sure, fair.
15 meeting, and I think someone else said an	15 Q And at the pre-op meeting, was that when you
16 operational meeting maybe.	16 assigned the team leads?
17 A Yeah, it's a pre-op meeting.	17 A I announced who the team leads were. I had
18 Q A pre-op meeting, okay. So if I understand	18 discussions with the team leads prior to the
19 you correctly, at least -- you made at least	19 pre-op meeting to make certain that their
20 ten copies of the search warrant that you	20 schedules were available and that they were
21 had with you at the pre-op meeting, and you	21 agreeable to their roles.
22 circulated those copies of the search	22 Q Who were the team leads that you just
23 warrant to everybody who was present there	23 discussed that were announced at the pre-op
24 so that they could ask questions and read	24 meeting?
25 it?	25 A Special Agent Matthew Anderson was for
5	7
1 A And inspect the warrant, yes, so that they	1 Lakeshore Cleaners address. Special Agent
2 were comfortable, yes.	2 Ryan Windorff was for the investment
3 Q What questions, if any, did any of the	3 property at 4801 North Richmond, and Special
4 participants at the pre-op meeting ask about	4 Agent Eric Beine was for the Nichols
5 what was to be searched -- ask about	5 homestead residence.
6 anything really? What questions did they	6 Q I think we don't have more than one person
7 ask?	7 with each last name. So if I just refer to
8 A I don't remember.	8 them by agent and then their last name,
9 MS. CARSON: Object as to form.	9 you'll know who I'm talking about, right?
10 Vague. Go ahead and answer.	10 A Yes, sir.
11 THE WITNESS: I don't recall the	11 Q Okay. When did you first talk with Agent
12 questions. There were questions. I did	12 Anderson about his assignment in relation to
13 clarify questions. I can't recall what they	13 this case?
14 were and from who they were from.	14 A I would have no idea. Days, maybe even
15 BY MR. OLSEN:	15 weeks prior to the pre-op meeting.
16 Q Okay. Do you remember if anybody spoke --	16 Q When did you first show Agent Anderson a
17 so in your recollection, some people asked	17 copy of the search warrant that's at issue
18 questions of you at the pre-op meeting about	18 in this case?
19 something?	19 A On the morning of the pre-op meeting.
20 A Yes.	20 Q Before the pre-op meeting started or at the
21 Q Okay. Do you remember what the subject	21 time that the pre-op meeting started?
22 matter of the questions that were asked of	22 A During the meeting when I passed it around
23 you at the pre-op meeting was?	23 to all parties.
24 A No.	24 Q Would that be the same answer as to Agent
25 Q You've already said you don't remember who	25 Windorff and Agent Beine?
6	8

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1 A Yes.	1 is that as close as you can remember, as we
2 Q Did the meetings -- did the pre-op meeting	2 sit here today, to the instructions you gave
3 start at around 7 o'clock a.m.?	3 as you were giving them at the pre-op
4 A That's accurate.	4 meeting?
5 Q Around what time did the pre-op meeting end?	5 A I mean it's not verbatim. It's not
6 A Approximately one hour later.	6 identical. But that is a very close and
7 Q What did you understand would be searched	7 fair representation or synopsis of what I
8 for at the Wolff premises pursuant to the	8 wanted executed in accordance with the
9 affidavit that's at issue in this matter on	9 warrant. It's primarily for those
10 March 22, 2022?	10 communicative records, whether they were
11 A I'm confused by your question because you	11 electronic mail, text message, talk app
12 just asked something about the affidavit,	12 communications, whatever those were.
13 and then I think the search warrant is	13 Q And strictly limited to the time that
14 referenced as well. So which document are	14 Mr. Wolff was in office?
15 we talking about? Those are two separate	15 A That's correct. I believe it was April of
16 legal documents.	16 -- there was an exact date that I had
17 MR. OLSEN: Could you read the	17 offered. I don't know the exact date. But
18 question back?	18 I believe it was sometime in April 2021. So
19 (Requested portion read by reporter.)	19 from the point he took office, was sworn
20 MR. OLSEN: I misspoke. I'm sorry.	20 into office, to present, at that time.
21 BY MR. OLSEN:	21 Q And you also indicated that the search was
22 Q What did you understand would be searched	22 for campaign materials?
23 for at the Wolff premises pursuant to the	23 A Communications related to those things. It
24 legal authority that you obtained with a	24 was communications that we were after.
25 warrant and with an affidavit that supported	25 Q Communications related to --
9	11
1 the issuance of that warrant on March 22,	1 A And/or proof of -- I'm sorry. Go ahead.
2 2022?	2 Q Communications related to political
3 MS. CARSON: Object as to form.	3 campaigns, other than Mr. Wolff's own,
4 Compound and vague. Go ahead and answer.	4 correct?
5 THE WITNESS: Primarily	5 A Anyone that he was communicating with that
6 communications between any fellow town board	6 was a fellow elected official --
7 members, employees, or entities that were	7 Q Okay.
8 involved with quotes and contracts and any	8 A -- on that town board.
9 campaign-related documentation.	9 Q Okay. But limited to the time after
10 BY MR. OLSEN:	10 Mr. Wolff took office, correct?
11 Q Do you remember, as we sit here today, what	11 A Yes.
12 instructions you gave to the participants at	12 Q And then I believe --
13 the pre-op meeting as far as what they were	13 A Or related to his election at that point.
14 searching for?	14 That would have been the only thing that
15 A Those same articles, so the -- all	15 would have predated that oath of office
16 electronic -- any electronic communications,	16 time. The oath of office time involved the
17 e-mails, records about discussions related	17 communications from the point he took office
18 to any town business, contracts, quotes, any	18 going forward and then the campaign
19 town business from the point Mr. Wolff was	19 materials that he utilized to become a
20 elected to present. So there was a very	20 member of his office.
21 distinct time frame. So if anything was	21 Q Okay. Now, those could be paper documents
22 outside of that time frame, I explicitly	22 or electronic records, correct?
23 said we were not interested and that was not	23 A Correct.
24 relevant to the warrant.	24 Q When people asked questions at the pre-op
25 Q Has the explanation you just gave right now,	25 meeting, did they ask questions, if you
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<p>1 remember, about what specifically they were</p> <p>2 to search for at the Wolff premises on</p> <p>3 March 22, 2022?</p> <p>4 A Again, I don't specify -- I don't recall</p> <p>5 what their specific questions were. I</p> <p>6 answered all questions, and I personally</p> <p>7 professionally specified the documents that</p> <p>8 were sought under the search warrant.</p> <p>9 Q Who wrote the -- is it the operation plan or</p> <p>10 the operational plan? How is that said?</p> <p>11 A The operation plan. I drafted that.</p> <p>12 Q Did the operation plan specify exactly what</p> <p>13 was to be searched for, or was it your</p> <p>14 verbal instructions that specified exactly</p> <p>15 what was to be searched for at the Wolff</p> <p>16 premises on March 22, 2022?</p> <p>17 A The search warrant specified the search</p> <p>18 materials. The operation plan is a</p> <p>19 synopsis, a picture and time of the ongoing</p> <p>20 case and the operation that would be</p> <p>21 executed, background information.</p> <p>22 Q Okay. So when Officer Anderson -- I'm</p> <p>23 sorry, Agent -- Special Agent Anderson,</p> <p>24 right?</p> <p>25 A Yes, sir.</p> <p style="text-align: right;">13</p>	<p>1 that business that were searched.</p> <p>2 BY MR. OLSEN:</p> <p>3 Q So if I understand your answer correctly --</p> <p>4 and correct me if I'm wrong -- it was</p> <p>5 Special Agent Anderson and the search team</p> <p>6 under him that searched all the parts of the</p> <p>7 Lakeshore Cleaners business that could have</p> <p>8 contained records of the type that you</p> <p>9 earlier described as being the target of</p> <p>10 this search? Would you call those records</p> <p>11 the target?</p> <p>12 A Focus.</p> <p>13 Q The focus?</p> <p>14 A Yes, yes.</p> <p>15 Q And it was Special Agent Anderson and his</p> <p>16 team's job to search all the areas of that</p> <p>17 Lakeshore Cleaners business that could have</p> <p>18 contained the records that were the focus of</p> <p>19 the 3/22/22 search and no other areas,</p> <p>20 correct?</p> <p>21 A Yes.</p> <p>22 Q And Special Agent Anderson and his team made</p> <p>23 a best effort to determine what were the</p> <p>24 boundaries of the Lakeshore Cleaners</p> <p>25 business and not to search any records of</p> <p style="text-align: right;">15</p>
<p>1 Q When Special Agent Anderson searched the</p> <p>2 business premises, he would have known,</p> <p>3 based on your verbal instructions, exactly</p> <p>4 what he was looking for, correct?</p> <p>5 A Yes. And I was even at that premises while</p> <p>6 Agent Anderson executed the warrant, so I</p> <p>7 was available for any questions or</p> <p>8 clarifications.</p> <p>9 Q Were there any areas of the business</p> <p>10 premises that could have contained records</p> <p>11 of the type you just described that</p> <p>12 Special Agent Anderson or the team that he</p> <p>13 was leading did not search?</p> <p>14 A Could you repeat the question?</p> <p>15 MR. OLSEN: Yeah. Can you read it</p> <p>16 back?</p> <p>17 (Requested portion read by reporter.)</p> <p>18 THE WITNESS: So I want to clarify.</p> <p>19 There are two businesses at that location.</p> <p>20 And we attempted to discern what the</p> <p>21 boundaries of both businesses were, and we</p> <p>22 contained our search only to the Lakeshore</p> <p>23 Cleaners business. I believe all parts of</p> <p>24 the Lakeshore business were searched. There</p> <p>25 were different areas or quadrants inside</p> <p style="text-align: right;">14</p>	<p>1 another business that was present on the</p> <p>2 premises, fair?</p> <p>3 A I believe that's accurate, yes.</p> <p>4 Q Special Agent Anderson was responsible for</p> <p>5 executing the task that I just described,</p> <p>6 but he would ask you if he had any</p> <p>7 questions, correct?</p> <p>8 A I was available for any clarification</p> <p>9 questions, yes.</p> <p>10 Q All right. Did Special Agent Anderson</p> <p>11 actually ask you any questions or</p> <p>12 clarifications on the day of the search</p> <p>13 about what should or shouldn't be searched</p> <p>14 or done on that day?</p> <p>15 A There were multiple people that did ask me</p> <p>16 questions. I cannot say for certain that it</p> <p>17 was Special Agent Anderson or others.</p> <p>18 Q Now, Special Agent Windorff was the team</p> <p>19 lead you had testified, I believe, in charge</p> <p>20 of searching 4801 North Richmond Avenue?</p> <p>21 A Yes.</p> <p>22 Q And, again, his job would have been to</p> <p>23 search for the records that you've described</p> <p>24 and no others, correct?</p> <p>25 A His team and him were responsible for</p> <p style="text-align: right;">16</p>

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1 searching. He was responsible for the	1 do you remember?
2 overall documentation, photographing, all	2 A I don't recall the fire number.
3 formal documentation and briefing.	3 Q Okay. At any rate, there was -- the warrant
4 Q Would Special Agent Windorff have been	4 also referenced the search of the house in
5 responsible for using his professional	5 Nichols, correct?
6 training to execute the instructions that	6 A Yes.
7 you gave at 4801 North Richmond on 3/22/22?	7 Q And that house was -- could you help me with
8 A Yes.	8 the pronunciation of that agent's name
9 Q What questions, if any, did you receive from	9 again?
10 Special Agent Windorff during the execution	10 A Beine.
11 of the search warrant on 3/22/22 that you	11 Q Beine.
12 remember here today?	12 A Special Agent Eric Beine.
13 A I don't recall any follow-up.	13 Q Okay. So Special Agent Eric Beine was in
14 Q You were here earlier for Special Agent	14 charge of the search at Nichols, correct?
15 Windorff's deposition, correct?	15 A He was the team lead.
16 A Yes.	16 Q Okay. He was the team lead of the group of
17 Q Special Agent Windorff explained that there	17 DCI personnel who searched at Nichols,
18 were three rooms at 4801 North Richmond	18 correct?
19 Avenue property, two of which appeared,	19 A Yes.
20 based on his analysis of the situation, to	20 Q Did Eric Beine and his team search all the
21 be the rooms of Herbert Wolff and a gentleman	21 areas at the Nichols' property that could
22 by the last name of Clark, correct?	22 have contained records of the type that
23 A That was his testimony.	23 you've just described as being the focus of
24 Q Right. And those rooms were searched,	24 the search?
25 correct?	25 A I believe so.
17	19
1 A I believe all rooms were searched.	1 Q That would have been their job, correct?
2 Q So unlike the search at the Lakeshore	2 A Yes.
3 business premises, which was limited to the	3 Q You never provided copies of the affidavit
4 portion of the business -- the portion of	4 upon which the search warrant was -- at
5 the premises and the area search that were	5 issue in this case was based to any of the
6 within the boundaries as your team could	6 personnel who participated in the search on
7 ascertain them of the Lakeshore Cleaners	7 March 22, 2022, prior to that date or on
8 businesses, the search at 4801 North	8 that date, correct?
9 Richmond also searched the room of Herbert	9 A Never.
10 Wolff, correct?	10 Q What crimes did you understand you and your
11 A Yes. I don't know whose rooms -- I need to	11 personnel were searching for evidence of on
12 clarify. I don't know whose rooms were	12 March 22, '22, at the Wolff premises?
13 whose. But all rooms were searched, all	13 A Misconduct in public office, a contract
14 vehicles were searched, all buildings were	14 violation, open meeting violations, walking
15 searched in accordance with the warrant.	15 quorums, false swearing, and if there was
16 Q So your understanding -- did you personally	16 proof of residency violation, that would
17 go to 4801 North Richmond on the day of the	17 have expanded or included voting violations.
18 search?	18 Q Have you ever executed a search warrant,
19 A No.	19 other than the search warrant on March 22,
20 Q And I should have said not go to. I should	20 '22, that was related to the residency or
21 have said did you go into. You didn't go	21 the claimed residency of an elected
22 inside of 4801 North Richmond on the day of	22 official?
23 the search or any other day, correct?	23 A The search warrant was primarily for
24 A I did not.	24 misconduct in public office. That was the
25 Q As far as Nichols, what's the address there,	25 basis and foundation of the warrant.
18	20

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1 Q So the basis and the foundation of the 2 warrant was not related to residency? 3 A Not primarily. Because when you execute a 4 search warrant, it is automatic that we 5 establish or determine residency when you 6 execute a search warrant. So any time 7 there's an execution of a search warrant, we 8 always try to gain proof, physical or any 9 other proof, of whose residence that is. It 10 is not unusual -- it is very common. In 11 every single search warrant that I've ever 12 done, hundreds of search warrants, you 13 always try to establish a residency, who is 14 -- who lives there and who comes and goes, 15 who's responsible for living there. 16 So lots of times you will search for 17 documents, mail articles, any sort of 18 documents that show residence. It could be 19 tax documents. It could be healthcare 20 records. It could be mail documents. It 21 could be banking documents. It could be 22 ledgers. It can be anything to determine 23 who is in control of a residence. So that's 24 included in the general execution of a 25 search warrant. 21	1 establish that. 2 Q So -- 3 A In the warrant. I want to be clear, in the 4 warrant. 5 Q Yeah. I'm trying to steer clear of your 6 investigation here. Okay? The misconduct 7 in public office statute itself -- I am not 8 talking about your theories or your 9 investigation here, which I understand you 10 need to keep private to yourself at this 11 point, is a broadly written statute, fair? 12 A Fair. 13 Q Okay. Are there any -- can you give an 14 example of a document that could not 15 plausibly be evidence of misconduct in 16 public office that was present at the -- for 17 example, the business premises on March 22, 18 2022? 19 A Anything business related. So, you know, if 20 there were -- Mr. Wolff runs a landscape 21 business. There was -- you know, if there's 22 CAD drawings of projects, if there are 23 quotes for work, anything related to the 24 business, or for that matter any personal 25 things, my expectation was to stay clear of 23
1 Q So the general execution of a search warrant 2 would include any record with the name and I 3 suppose address of the person in the search 4 premises? 5 A Yes. And even more specific if you can -- 6 this is outside this warrant. But say you 7 have, you know, a building, and it has 8 multiple units. You know, you're looking 9 for, you know, Unit A or No. 1, or you're 10 looking for proof of things as to who 11 occupies or controls those spaces because we 12 -- that's -- lawfully that's important to 13 understand to make sure that you're not 14 outside of the scope of your warrant. 15 Q I think I got that the basis -- did you use 16 the words primary basis or primary -- I 17 don't remember. You said the primary basis 18 of the warrant or something like that? 19 A Yeah, the focus of the warrant, yeah, the 20 primary basis was for that misconduct in 21 public office because that was more all 22 encompassing of all of those things. 23 Q Okay. 24 A And so that was the minimum probable cause 25 minimal charge that was utilized to 22	1 that. We were not there for his business or 2 personal records. 3 Q Okay. You've examined the declarations 4 filed in this matter I'm sure, correct? 5 A Declarations, I don't know what declarations 6 are. 7 Q Let me ask you this. Was -- what would have 8 been the purpose for searching areas where 9 Karri Wolff kept her clothing? 10 A Anything that we were searching for could be 11 hidden or located anywhere. So, for 12 instance, I found -- this is not related, 13 but I have found drugs in cat litter. I 14 have found troves of child pornography in a 15 speaker. It's endless to list where I have 16 found contraband or articles of things of 17 evidentiary matter. 18 So when we're looking for SD cards, 19 thumb drives, cellular telephones, tablet 20 devices, laptop computers, those can be 21 placed anywhere. And in an abundance of 22 thoroughness -- and we didn't know whose 23 areas were whose. So, you know, we try hard 24 to decipher that or determine that. But in 25 order to be thorough, you look in all areas 24

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1 for those articles. 2 Q Okay. 3 A So we don't know, for instance, what an 4 underwear drawer is. We have no idea. We 5 don't know which one is the silverware 6 drawer. We don't -- you know, I mean, we've 7 found things in coffee grounds. So we -- in 8 an abundance of thoroughness, we look 9 through everything. 10 Q Okay. So in order to properly execute these 11 -- this warrant on March 22, 2022, the 12 agents and their teams had to search every 13 place where there could be on SD card, a 14 thumb drive, a paper, or any of the other 15 types of records that you've described as 16 being the focus of this search, correct? 17 A Yes. 18 Q The agents and the team leads had some 19 discretion to not search areas that for 20 whatever reason they felt would not be 21 fruitful, fair? 22 A Yes. 23 Q As far as contract violations, what do you 24 mean by that? 25 A That term is used interchangeably in the 25	1 for on -- you and the team of special agents 2 that you've described, what would be 3 evidence of an open meeting violation that 4 you were looking for on March 22, 2022? 5 A Mr. Wolff communicating with at least two 6 other seated board members about the 7 township business. 8 Q Okay. 9 A Anything related to decision-making things 10 or township business. 11 Q Okay. And so, again, that would be any type 12 of electronic records, any type of paper 13 records, I suppose plausibly recordings, if 14 they existed? 15 A There are recordings of meetings, so, yeah, 16 that was fair. That was fair. 17 Q All right. The voting violations would be 18 related to residency, correct, or are you 19 saying voting on the town board or voted in 20 an election? 21 A That's two parts. I mean Mr. Wolff could 22 have performed votes that were in favor of 23 his personal professional business, and then 24 if indeed he didn't reside where he said he 25 did, you know, and/or Mrs. Wolff, then those 27
1 criminal investigation, and there were 2 allegations that while Mr. Wolff was seated 3 in his position, that was part of the 4 misconduct, that he performed services 5 outside of his authority or right in 6 accordance with law. 7 So if there was -- if there was 8 evidence of those things, that was part of 9 the misconduct. So we were searching for 10 any proof of quotes or quote/unquote 11 contracts. I have to be very conceded with 12 attorneys, and I've been schooled more than 13 I care to be about contracts versus quotes. 14 But we were looking for those kinds of 15 records that were allegations of Mr. Wolff's 16 misconduct. 17 Q As far as -- so I think you said misconduct 18 in public office, contract violations, false 19 swearing, possible voting violations. I 20 feel like I missed one or two. 21 A The open meeting violations, walking 22 quorums, I mean anything related to those 23 things. 24 Q Okay. Is it -- what would be evidence of an 25 open meeting violation that you were looking 26	1 were germane to my local investigation. 2 Q I think I asked you if you had ever done 3 other searches in relation to politicians 4 who are accused of not living in the 5 district. And then it -- the questions took 6 a little bit of a turn towards that that 7 wasn't a primary basis of the warrant. 8 A I recall. 9 Q Okay. Let's just go back to that question. 10 Understanding now that you've answered that 11 the primary basis of the warrant was not 12 residency, I would like to ask the question, 13 do you recall ever then investigating a 14 politician on the accusation that that 15 politician did not live in the district 16 where he or she served and represented? 17 A I have done other investigations where there 18 have been allegations that elected officials 19 did not live in -- within their jurisdiction, 20 which is obviously foundational to 21 democracy. 22 Q Right. I think I asked the question poorly. 23 Because what I may be hearing -- and I just 24 want to make sure that it's clear. What I 25 may be hearing is that you did other 28

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<p>1 investigations that perhaps had a different</p> <p>2 -- you know, that were about a number of</p> <p>3 things, but one strand or tangent of that</p> <p>4 investigation was that the person didn't</p> <p>5 live there. I don't know if that's what you</p> <p>6 were answering or not.</p> <p>7 I'm trying to ask, in your</p> <p>8 recollection have you ever performed an</p> <p>9 investigation of a politician who has</p> <p>10 alleged to not be living in their district</p> <p>11 with no other related allegations that were</p> <p>12 the primary basis?</p> <p>13 A Yeah. I was involved in an investigation</p> <p>14 where it was alleged a district attorney</p> <p>15 didn't live in the county in which they</p> <p>16 served. I believe I was involved in a</p> <p>17 school board investigation where the school</p> <p>18 board member may not have been living in the</p> <p>19 jurisdiction. So I have done those kinds of</p> <p>20 investigations previously. Does that answer</p> <p>21 what you were saying?</p> <p>22 Q On approximately how many occasions?</p> <p>23 A Oh, boy.</p> <p>24 Q Less than ten?</p> <p>25 A I would say less than ten is fair.</p> <p style="text-align: right;">29</p>	<p>1 you can.</p> <p>2 MR. OLSEN: Oh, because of that.</p> <p>3 Okay. Let me rephrase it because we've got</p> <p>4 an objection, so I want to make sure that I</p> <p>5 have something that can stand up later.</p> <p>6 BY MR. OLSEN:</p> <p>7 Q What instructions did you give, if any, at</p> <p>8 the pre-op meeting to make sure that Special</p> <p>9 Agents Anderson, Windorff, and Beine and</p> <p>10 their teams searched all of the areas that</p> <p>11 they needed to to find the evidence that</p> <p>12 you've described was being searched for?</p> <p>13 A I didn't exclude areas. I explained the</p> <p>14 scopes of the warrant and areas that</p> <p>15 Mr. Wolff alleged to have authority over or</p> <p>16 a connection with. So it was those three</p> <p>17 locations. It was his vehicles. It was</p> <p>18 outbuildings. It was his person. And I</p> <p>19 explained it was more of the areas that were</p> <p>20 included versus the areas that were excluded</p> <p>21 because I didn't know what those would be.</p> <p>22 Those are -- excuse the pun, but that's a</p> <p>23 game-time decision. I don't know what areas</p> <p>24 were going to be out of bounds until you see</p> <p>25 them or decipher them.</p> <p style="text-align: right;">31</p>
<p>1 Q Okay. Could you narrow it down to less than</p> <p>2 five, or would you prefer to stay at less</p> <p>3 than ten? It's your call. It's not that</p> <p>4 important.</p> <p>5 A Yeah, I don't want to misstate and then you</p> <p>6 try to jab me up on that.</p> <p>7 Q What steps, if any, did you take at the</p> <p>8 pre-op meeting to make sure that Anderson,</p> <p>9 Windorff -- that Agents Anderson, Windorff,</p> <p>10 and Beine and their teams searched all the</p> <p>11 areas that they needed to search to find the</p> <p>12 records that you've described and no other</p> <p>13 areas?</p> <p>14 A And no other areas?</p> <p>15 Q Right. Because they were not supposed to</p> <p>16 search areas that couldn't contain those</p> <p>17 materials, but they were supposed to search</p> <p>18 all the areas of those premises that could</p> <p>19 contain those materials. And I'm asking,</p> <p>20 what specific instructions you gave, if any,</p> <p>21 to make sure that those officers -- those</p> <p>22 agents, those special agents and their</p> <p>23 teams, did what they needed to do?</p> <p>24 MS. CARSON: I'm going to object as</p> <p>25 to form. Compound. Go ahead and answer if</p> <p style="text-align: right;">30</p>	<p>1 So, for instance, when we were at the</p> <p>2 -- at the business location, Lakeshore</p> <p>3 Cleaners, I didn't necessarily realize or</p> <p>4 understand what the boundaries were inside</p> <p>5 that business. So once we understood this</p> <p>6 was the area of the Legendary Lawn Care</p> <p>7 business or whatever that was, then we</p> <p>8 communicated amongst ourselves that's off</p> <p>9 limits. We're not going there. They're not</p> <p>10 involved with this.</p> <p>11 So -- and I had to rely on the</p> <p>12 professional experience and training of</p> <p>13 those individuals that I was very</p> <p>14 comfortable with to be able to make those</p> <p>15 choices and decisions.</p> <p>16 Q Okay. So as to 4801 North Richmond Avenue,</p> <p>17 it would have -- one possibility would have</p> <p>18 been to not search the rooms of Herbert</p> <p>19 Wolff and Mr. Karp once it became apparent</p> <p>20 that those might be their rooms, but another</p> <p>21 decision might be that it needed to be</p> <p>22 searched because perhaps there would be</p> <p>23 evidence there of the type that you</p> <p>24 described, correct?</p> <p>25 A Those professionals did not know what rooms</p> <p style="text-align: right;">32</p>

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1	were in whose control. And that investment	1	colleagues. And I believe they searched in
2	property was in Mr. and Mrs. Wolff's name.	2	those areas. I don't know of any areas that
3	So there was indication that there were	3	were out of bounds or off limits to us at
4	other parties living there, but the whole	4	the properties that they owned.
5	thing had to be searched. And to this day,	5	Q I am not suggesting that there were. I'm
6	there's still no proof of -- that I'm aware	6	saying that, for example, just to be
7	of. I have no impression. I have no	7	perfectly frank here, I don't think anybody
8	knowledge or information as to whose area	8	looked in the coffee grounds. And you're
9	was whose area. I have no idea.	9	saying that you found things like that there
10	Q Okay.	10	before. So they had some discretion --
11	A That investment property was owned by the	11	A Not there.
12	Wolffs. That's what I know. And through my	12	Q No, no. In other searches you found
13	own human intelligence, I knew that there	13	incriminating evidence in -- you gave two
14	were two individuals that were staying	14	examples -- coffee grounds and kitty litter.
15	there. I have no idea where their -- where	15	You said it was drugs and a trove of other
16	their areas -- you know, where their private	16	-- first of all, whatever was ultimately
17	areas were. I have no idea.	17	found, there was no intention of searching
18	Q Okay. But the whole business property was	18	for any narcotics on 3/22/22 at the Wolff
19	also owned by the Wolffs, correct?	19	premises, correct?
20	A Correct.	20	A Never.
21	Q But, nevertheless, you made the discretionary	21	Q Right.
22	decision to determine what were the	22	A At either of the -- at any of the Wolff
23	boundaries of the Legendary Lawn Care and	23	premises.
24	not search that area on the day of,	24	Q Fair. And, similarly, although obviously
25	game-time decision, correct?	25	there was an investigation into the things
33		35	
1	A Based on Mr. Wolff's input.	1	you've described, there was never any
2	Q Okay. And, similarly, the officers who went	2	allegation of anything like child
3	to 4801 North Richmond Avenue -- I keep	3	pornography? That was an example you gave
4	saying officers. The special agents who	4	to illustrate a point about other cases,
5	went to 4801 North Richmond Avenue, they	5	correct?
6	were also -- based on their oath and all	6	A There's a point to illustrate that if
7	their training, they also had to make	7	someone is involved in criminal misconduct,
8	discretionary decisions about where to	8	they will go to great lengths to hide,
9	search and where not to search, correct?	9	withdraw evidence of what they're involved
10	A Yes.	10	with. So anything can be stored anywhere,
11	Q And similarly, in Nichols Eric --	11	you know, qualified with size, right? If
12	A Beine.	12	I'm going to a location and I'm looking for
13	Q -- Beine -- thank you -- and his team had to	13	a car, I can't go in their kitchen drawers.
14	make discretionary decisions day of where to	14	Q But in this case, the evidence could have
15	find this rather broad array of evidence	15	been on a little SD card? It could have
16	that could evidence all these items that	16	been on a thumb drive? So every place that
17	were the primary focus of the investigation	17	could have contained an item like that had
18	and then look there, correct?	18	to be searched, correct?
19	A Yes.	19	A Yes.
20	Q Okay. And they also had to decide which	20	Q I understand that at the different locations
21	areas not to look in, correct?	21	not every single area that could have
22	A I can't answer that. I --	22	contained an SD card was searched. So I'm
23	Q Okay.	23	asking you if that is, in fact, the case,
24	A I know what areas were included in the	24	that would have been up to the discretion of
25	warrant, and that was conveyed to my	25	each team leader and each special agent to
34		36	

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1 figure out what was worth searching and what
2 was not, correct?
3 A I don't know that -- I was told that all
4 areas were searched.
5 Q Okay. So if there was any area that could
6 have contained information -- evidence of
7 the type that you described as being -- that
8 we've talked about again and again, so I'm
9 not going to reiterate it -- all the areas
10 that could have contained that should have
11 been searched, right?
12 A I believe so, yes.
13 MR. OLSEN: We're really almost done
14 here. I'm going to ask Attorney Curtis for
15 some input.
16 MR. CURTIS: No. I think you pretty
17 well covered it. You've asked more
18 questions than I would have, and you got
19 some good information.
20 MR. OLSEN: All right. With that,
21 that is the end of the deposition. Thank
22 you very much.
23 (Matter concluded at 11:00 a.m.)
24
25

37

1 STATE OF WISCONSIN)
2) ss.
3 COUNTY OF WASHINGTON)
4
5 I, Jessica Koepsell, Certified Realtime
6 Reporter and Notary Public in and for the
7 State of Wisconsin, do hereby certify that
8 the attached and foregoing deposition was
9 taken via videoconference, on the 30th day
10 of June, 2023, A.D., at 10:10 a.m.; that it
11 was taken at the request of the adverse
12 parties, upon oral interrogatories; that
13 said JAY YERGES was sworn by me to tell the
14 truth, the whole truth, and nothing but the
15 truth relative to said cause.
16 Dated this 11th day of July, 2023.

17 HENES & ASSOCIATES
18 COURT REPORTING SERVICE

19
20 _____
21 Jessica Koepsell
22 Registered Professional Reporter
23 Certified Realtime Reporter

24 My commission expires January 24, 2024.
25

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